

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

IN RE:)	
)	
HEADWAY WORKFORCE)	Case No. 25-01682-5-JNC
SOLUTIONS, INC., et al.)	
)	Chapter 11 (Jointly Administered)
)	
Debtors.)	

**REQUEST FOR HEARING OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS TO THE MOTION FOR AN ORDER PURSUANT TO 11 U.S.C. §§ 105, 362
AND 541 AND BANKRUPTCY RULE 3001 ESTABLISHING NOTIFICATION AND
HEARING PROCEDURE FOR TRADING IN CLAIMS OR EQUITY SECURITIES**

The Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), by and through its proposed counsel, hereby files this request for hearing (the “Request”) on the Debtors’ *Motion for an Order Pursuant to 11 U.S.C. §§ 105, 362 and 541 and Bankruptcy Rule 3001 Establishing Notification and Hearing Procedure for Trading in Claims or Equity Securities* [ECF No. 77] (the “Motion”).

The Committee requests a hearing on the Motion and relief requested therein.

**WALDREP WALL BABCOCK &
BAILEY PLLC**

/s/ Ciara L. Rogers

Ciara L. Rogers (N.C. Bar No. 42571)

Jennifer B. Lyday (N.C. Bar No. 39871)

Zachary Malnik (N.C. Bar No. 61807)

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*Proposed Counsel for Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
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CERTIFICATE OF SERVICE

I, Ciara L. Rogers, certify that, on June 9, 2025, I caused a copy of the foregoing **REQUEST FOR HEARING OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO THE MOTION FOR AN ORDER PURSUANT TO 11 U.S.C. §§ 105, 362 AND 541 AND BANKRUPTCY RULE 3001 ESTABLISHING NOTIFICATION AND HEARING PROCEDURE FOR TRADING IN CLAIMS OR EQUITY SECURITIES** to be served via electronic service through CM/ECF upon those who registered for such service and via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list attached hereto as Exhibit A.

Respectfully submitted, this the 9th day of June, 2025.

WALDREP WALL BABCOCK & BAILEY PLLC

/s/ Ciara L. Rogers

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*Proposed Counsel for Official Committee
of Unsecured Creditors*

EXHIBIT A

Via CMF/ECF

Brian C. Behr, Esq. Bankruptcy Administrator

Rebecca Redwine Grow, Esq., Attorney for Debtor

Via First Class U.S. Mail

Headway Workforce Solutions, Inc.
c/o Brendan Flood, CEO
3100 Smoketree Court, Ste 900
Raleigh, NC 27604

Staffing 360 Solutions, Inc.
c/o Brendan Flood, CEO
757 3rd Avenue, 27th Floor
New York, NY 10017

Key Resources, Inc.
c/o Brendan Flood, CEO
4 Oak Branch Drive, Suite 4-A
Greensboro, NC 27407

Monroe Staffing Services, LLC
c/o Brendan Flood, CEO
6 Research Drive, Ste 440
Shelton, CT 06484

Lighthouse Placement Services, Inc.
c/o Brendan Flood, CEO
55 Ferncroft Road, Ste 100
Danvers, MA 01923-4036